

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
Connect America Fund) WC Docket No.10-90
A National Broadband Plan for Our Future) GN Docket No. 09-51
)
Establishing Just and Reasonable Rates for) WC Docket No.07-135
Local Exchange Carriers)
)
High-Cost Universal Service Support) WC Docket No.05-337
)
Developing a Unified Intercarrier) CC Docket No. 01-92
Compensation Regime)
)
Federal-State Joint Board on Universal) CC Docket No. 96-45
Service)
)
Lifeline and Link-Up) WC Docket No.03-109
)
Universal Service Reform-Mobility Fund) WT Docket No.10-208

**COMMENTS OF THE NEW MEXICO EXCHANGE CARRIER GROUP
ON DELL TELEPHONE COOPERATIVE'S PETITION FOR WAIVER**

The New Mexico Exchange Carrier Group ("NMECG"), representing 11 of the rural rate-of-return regulated local exchange carriers in New Mexico, submit these Comments in connection with Dell Telephone Cooperative's ("Dell Telephone") Petition for Waiver of certain high-cost universal service rules filed in this proceeding on June 6, 2012.

New Mexico is the 5th largest state geographically with over 121,000 square miles, but it has a population of only about 2 million leaving it 37th among the states in population. As a result, New Mexico's overall rate of inhabitants per square mile is 17.13, ranking it 45th among the states for

population density. Collectively, the NMECG's members serve more than 33,000 telecommunications customers in rural areas of New Mexico comprising more than 76,000 square miles, 2.24 customers per square mile, where larger carriers historically have failed or been unwilling to provide high quality telecommunications services

The current NMECG members are: Baca Valley Telephone Company, Dell Telephone Cooperative, ENMR Telephone Cooperative, La Jicarita Rural Telephone Cooperative, Leaco Rural Telephone Cooperative, Penasco Valley Telephone Cooperative, Roosevelt County Rural Telephone Cooperative, Sacred Wind Communications, Tularosa Basin Telephone Company, Valley Telephone Cooperative and Western New Mexico Telephone Company. The NMECG submits these Comments in connection with Dell Telephone Cooperative's ("Dell Telephone") Petition for Waiver of certain high-cost universal service rules filed in this proceeding on June 6, 2012. The NMECG members are rural rate-of-return regulated local exchange carriers serving customers in a rural high cost areas of New Mexico. The NMECG supports Dell Telephone's Petition.

It is evident from the Petition and supporting materials submitted by Dell Telephone that application of the new universal service rules to Dell Telephone will have severe and undesired impacts on the ability of the Cooperative to continue to serve its customers. Dell Telephone's particular circumstances -- large, remote and rugged service area with extremely high service costs and low customer density -- cause it to be highly exposed to extraordinarily harsh consequences from application of the Commission's new USF rules.

While the NMECG acknowledges that reform of the high cost fund is viewed by the Commission to be essential to preservation and advancement of universal service throughout the country, they also join Dell Telephone in encouraging the Commission to grant relief

from its USF rules in those limited circumstances, such as those now confronting Dell Telephone, where application of the rules would be actively detrimental to the goal of preservation and advancement of universal service; Dell Telephone's Petition sets forth a compelling showing of the need for relief from the Commission's rules. The NMECG fully supports Dell Telephone's Petition and urges the Commission to act promptly to grant the requested waiver.

Respectfully submitted,

New Mexico Exchange Carrier Group

A handwritten signature in black ink that reads "Charles M. Ferrell". The signature is written in a cursive, flowing style.

By: _____

Charles M. Ferrell
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